



September 12, 2019

VIA ECF

Honorable Richard F. Boulware, II
Lloyd D. George Federal Courthouse
333 Las Vegas Blvd. South
Las Vegas, NV 89101

Re: Exhibits from Phase 1 of the Evidentiary Hearing in *Le v. Zuffa et al.*, Case No. 15-cv-01045

Dear Judge Boulware:

Zuffa, LLC (“Zuffa”) and Plaintiffs (jointly, the “Parties”) have met and conferred regarding the exhibits to be admitted from the first phase of the evidentiary hearing.

The Parties agree to admit the following exhibits, which are attached as Exhibits to this letter.

Ex. #	Exhibit identifier	Description
Pls. Ex. 1	PCCX41	Project Basquiat Final Posting Memo
Pls. Ex. 2	JCCX2	2016 Golden Boy Promotions Profit & Loss
Pls. Ex. 3	JCCX56	Gerald W. Scully, Player Salary Share and the Distribution of Player Earnings, 25(2) Managerial and Decision Economics 77 (2004)
Pls. Ex. 4	JCCX57	Golden Boy Promotions LLC v. Alan Haymon, 2:15-cv-03378-JFW-MRW, ECF No. 322-14 (C.D. Cal. January 6, 2017)
Pls. Ex. 5	JCCX63	Kevin Murphy & Robert Topel, The Economics of NFL Team Ownership (Chicago Partners, 2009)
Pls. Ex. 6	JCCX67	Michael W.L. Elsby, Bart Hobijn, & Aysegul Sahin, The Decline of the U.S. Labor Share, Brookings Papers on Economic Activity 1 (2013)
Pls. Ex. 7	JCCX72	Richard McGowan & John Mahon, Demand for the Ultimate Fighting Championship: An Econometric Analysis of PPV Buy Rates, 6(6) Journal of Business & Economics 1032 (2015)
Pls. Ex. 8	JCCX74	Roger D. Blair, Sports Economics (Cambridge University Press 2012)
Pls. Ex. 9	JCCX76	Ronald G. Ehrenberg & Robert S. Smith, Modern Labor Economics: Theory and Public Policy (9th ed., 2006)
Pls. Ex. 10	PCCX181-184	Email from S. Tecci to J. Mulkey, Subj: RE: can you update those 3 charts for total events, ppv and non-ppv?
Pls. Ex. 11	PCCX414 (excerpt)	30(b)(6) Deposition of Jeff Quinn on behalf of Zuffa, LLC (July 27, 2017), Exhibit 3

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Pls. Ex. 12	PCCX604	Phillip E. Areeda & Herbert Hovenkamp, Antitrust Law: An Analysis of Antitrust Principles and Their Application (4th ed. 2017)
Pls. Ex. 13	PCCX611	Redacted Expert Report of Gene Deetz (Sep. 6, 2016) Case No. 15-cv-3378, Dkt No. 237-1 (Nov. 9, 2016)
Pls. Ex. 14	PCCX621	Rodney D. Fort, Sports Economics (Prentice Hall 3rd ed. 2011)
Pls. Ex. 15	PCCX624	Roger D. Blair & David Kaserman, Antitrust Economics (Oxford University Press, 2nd ed. 2009)
Pls. Ex. 16	PCCX644	Simcha Barkai, Declining Labor and Capital Shares (U. of Chicago, New Working Paper Series No. 2, 2016)
Zuffa Ex. 4	JCCX24	Presentation of Observations Based on MMA Data
Zuffa Ex. 5	PCCX40	Declaration of David Lopez
Zuffa Ex. 6	PCCX652	Steven C. Salop, The Raising Rivals' Cost Foreclosure Paradigm, Conditional Pricing Practices and the Flawed Incremental Price-Cost Test, 81 Antitrust L.J. 371 (2017)
Zuffa Ex. 7	ZCCX179	Andrew Zimbalist, There's more than meets the eye in determining players' salary shared, Sports Business Journal (Mar. 10, 2008)
Zuffa Ex. 8	ZCCX292	Weight Data for Foreclosure (Ex. 4 to H. Singer Deposition)

The Court has not yet ruled on whether to admit the following exhibits to the hearing record, and Plaintiffs object to admitting them. These exhibits are also attached to this letter.

Zuffa Ex. 1	--	Table A3 in Dr. Singer's April 3, 2018 Report with Pre-Acquisition Strikeforce Bouts Removed
Zuffa Ex. 2	--	Table A2 in Dr. Singer's April 3, 2018 Report without Year Fixed Effects and Pre-Acquisition Strikeforce Bouts
Zuffa Ex. 3	--	Modify Table A1 in Dr. Singer's May 28, 2018 Report to Use Unweighted Foreclosure Shares and Without Pre-Acquisition Strikeforce

Respectfully yours,

William A. Isaacson & Eric L. Cramer
Attorneys for Plaintiffs and Defendant Zuffa, LLC